

WEIL, GOTSHAL & MANGES LLP  
 Alfredo R. Pérez, Esq. (AP 3629)  
 700 Louisiana, Suite 1600  
 Houston, TX 77002  
 Telephone: (713) 546-5000  
 Facsimile: (713) 224-9511  
 Attorneys for the Reorganized Debtors

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

In re

**WORLDCOM, INC., et al.,**

**Reorganized Debtors.**

**INTERNAL REVENUE SERVICE OF THE  
 UNITED STATES OF AMERICA,**

**Appellant,**

v.

**WORLDCOM, INC., et al.,**

**Appellees.**

**Chapter 11**

**Case No. 02-13533 (AJG)**

**(Jointly Administered)**

**07 Civ. 07414 (DLC)**

FILED  
 U.S. DISTRICT COURT  
 2007 SEP 10 AM 11:52  
 S.D. OF N.Y.

**NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE* FOR JAMES T. GROGAN**

PLEASE TAKE NOTICE that at a date and time to be designated by the Court, the undersigned will move for an order pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York admitting James T. Grogan to practice *pro hac vice* during the pendency of this action or until further order of this Court.

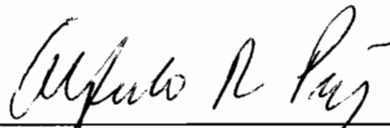
SEP 10 2007

507405  
 026-025-

XC

Dated: Houston, Texas  
September 7, 2007

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Alfredo R. Pérez", written in black ink.

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Alfredo R. Pérez, Esq. (AP 3629)  
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**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:
	:
<b>WORLDCOM, INC., <u>et al.</u>,</b>	:
	:
<b>Reorganized Debtors.</b>	:
-----X	
<b>INTERNAL REVENUE SERVICE OF THE</b>	:
<b>UNITED STATES OF AMERICA,</b>	:
	:
<b>Appellant,</b>	:
	:
<b>v.</b>	:
	:
<b>WORLDCOM, INC., <u>et al.</u>,</b>	:
	:
<b>Appellees.</b>	:
-----X	

**Chapter 11**  
**Case No. 02-13533 (AJG)**  
**(Jointly Administered)**  
  
**07 Civ. 07414 (DLC)**

**MOTION FOR ADMISSION *PRO HAC VICE* FOR JAMES T. GROGAN**

Alfredo R. Pérez ("Movant"), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States District Court for the Southern District of New York, and a member of Weil, Gotshal & Manges LLP, hereby moves the Court to enter an order permitting James T. Grogan to practice *pro hac vice* before the United States District Court for the Southern District of New York to represent Verizon Business Global LLC (successor by merger of reorganized debtor WorldCom, Inc.), as Appellee, in the appeal

numbered 07 Civ. 07414 (DLC) pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York. In support of the Motion, Movant states as follows:

1. Mr. Grogan is a member in good standing of the bars of the State of Texas, the Supreme Court of Texas, the United States District Courts for each of the Districts in Texas, and the Fifth Circuit Court of Appeals.

2. In support of the relief requested in this Motion, attached hereto as Exhibit A is the Affidavit of Movant in Support of this Motion for Admission *Pro Hac Vice* for James T. Grogan.

3. Also in support of this Motion, attached hereto as Exhibit B is a certificate of good standing from the bar of the State of Texas.

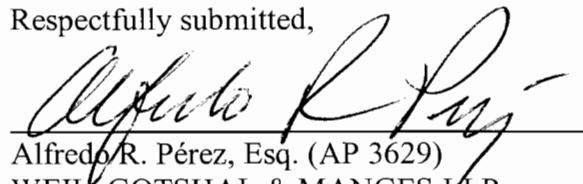
4. Movant requests that this Court approve this Motion so that Mr. Grogan may file pleadings and appear and be heard in the above-captioned appeal.

5. No previous request for the relief sought herein has been made to this Court.

WHEREFORE Movant respectfully requests that the Court enter an order permitting James T. Grogan to appear *pro hac vice* as counsel to Verizon Business Global LLC in the appeal captioned above and granting such other and further relief as is just. A proposed form of order is attached as Exhibit C.

Dated: Houston, Texas  
September 7, 2007

Respectfully submitted,



Alfredo R. Pérez, Esq. (AP 3629)  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana, Suite 1600  
Houston, TX 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511

Attorneys for the Reorganized Debtors

WEIL, GOTSHAL & MANGES LLP  
 Alfredo R. Pérez, Esq. (AP 3629)  
 700 Louisiana, Suite 1600  
 Houston, TX 77002  
 Telephone: (713) 546-5000  
 Facsimile: (713) 224-9511  
 Attorneys for the Reorganized Debtors

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:
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<b>WORLDCOM, INC., <u>et al.</u>,</b>	:
	:
<b>Reorganized Debtors.</b>	:
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<b>INTERNAL REVENUE SERVICE OF THE</b>	:
<b>UNITED STATES OF AMERICA,</b>	:
	:
<b>Appellant,</b>	:
	:
<b>v.</b>	:
	:
<b>WORLDCOM, INC., <u>et al.</u>,</b>	:
	:
<b>Appellees.</b>	:
-----X	

**Chapter 11**  
**Case No. 02-13533 (AJG)**  
**(Jointly Administered)**  
  
**07 Civ. 07414 (DLC)**

State of Texas        )  
                               )  
 County of Harris    )

**AFFIDAVIT OF ALFREDO R. PEREZ IN SUPPORT OF**  
**MOTION FOR ADMISSION *PRO HAC VICE* FOR JAMES T. GROGAN**

ALFREDO R. PEREZ, being duly sworn, hereby deposes and says as follows:

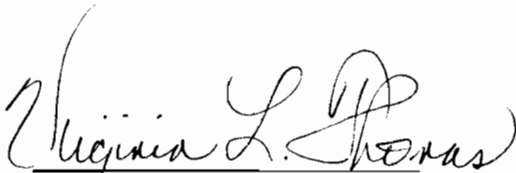
- I am a member of Weil, Gotshal & Manges LLP, counsel for Verizon Business Global LLC (successor by merger of reorganized debtor WorldCom, Inc.), in the above captioned action. I am familiar with the proceedings of this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit James T. Grogan as counsel *pro hac vice* to represent Appellee in this matter.

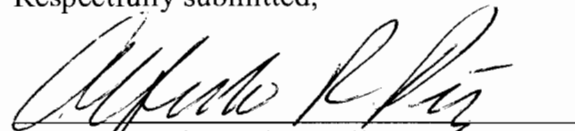
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on January 30, 2007. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing in this Court. I have been licensed to practice law in the State of Texas since 1980.
3. I have known James T. Grogan since 2002.
4. Mr. Grogan is an associate of Weil, Gotshal & Manges LLP, in Houston, Texas.
5. I have found Mr. Grogan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of James T. Grogan, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of James T. Grogan, *pro hac vice*, which is attached to the Motion as Exhibit C.

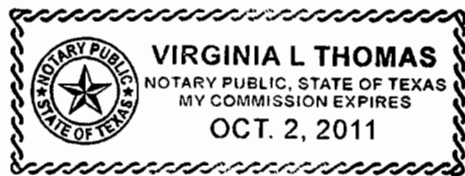
WHEREFORE it is respectfully requested that the motion to admit James T. Grogan, *pro hac vice*, to represent Appellee in the above captioned matter, be granted.

Dated: Houston, Texas  
September 7, 2007

Respectfully submitted,

  
Notary Public

  
Alfredo R. Pérez (AP3629)



# The Supreme Court of Texas

AUSTIN

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CLERK'S OFFICE

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I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

**JAMES TILLMAN GROGAN III**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 1st day of November, 2000.

I further certify that the records of this office show that, as of this date

**JAMES TILLMAN GROGAN III**

is presently enrolled with the State Bar of Texas as an active member in good standing.

**IN TESTIMONY WHEREOF** witness my hand  
and the seal of the Supreme Court of  
Texas at the City of Austin, this 5th day  
of September, 2007.

BLAKE HAWTHORNE, Clerk

by   
Brad Sonego, Deputy Clerk

No. 3716

**Exhibit C**

**Proposed Order**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	:
	:
WORLDCOM, INC., <u>et al.</u> ,	:
	:
Reorganized Debtors.	:
-----X	

Chapter 11  
Case No. 02-13533 (AJG)  
(Jointly Administered)

INTERNAL REVENUE SERVICE OF THE	:
UNITED STATES OF AMERICA,	:
	:
Appellant,	:
	:
v.	:
	:
WORLDCOM, INC., <u>et al.</u> ,	:
	:
	:
Appellees.	:
-----X	

07 Civ. 07414 (DLC)

**ORDER GRANTING MOTION FOR ADMISSION**  
**PRO HAC VICE FOR JAMES T. GROGAN**

Upon consideration of the motion seeking admission *pro hac vice* for James T. Grogan to represent Appellee Verizon Business Global LLC before the United States District Court for the Southern District of New York, IT IS HEREBY ORDERED that:

Applicant's Name: James T. Grogan

Firm Name: Weil, Gotshal & Manges LLP

Address: 700 Louisiana St., Ste. 1600  
Houston, Texas 77002

Telephone/Fax: Telephone: 713/546-5000  
Fax: 713/225-9511

Email Address: james.grogan@weil.com

is admitted to appear *pro hac vice* before this Court as counsel to Appellee Verizon Business Global LLC in the bankruptcy appeal number 07 Civ. 07414 (DLC).

Dated: New York, New York  
\_\_\_\_\_, 2007

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United States District Court Judge

**CERTIFICATE OF SERVICE**

I, Gayle E. Mitchel, certify that I caused a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* for James T. Grogan, to be served upon the party listed below via First-Class Mail and Electronic Mail on September 7, 2007.

  
Gayle E. Mitchel

Michael J. Garcia, United States Attorney  
for the Southern District of New York  
Attn: Benjamin H. Torrance, Esq.  
Danna Drori, Esq.  
Assistant United States Attorneys  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
benjamin.torrance@usdoj.gov  
danna.drori@usdoj.gov